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## ABSTRACT

A process assessment was conducted to determine the effectiveness of the procedure used by the Bureau of Occupational and Adult Education, U.S. Office of Education (USOE), in conducting State Management Evaluation Reviews for Compliance (MERC) with Federal legislation and regulations governing public vocational and adult education programs. The purpose was to assure that the continuation of the MERC process be of greatest value to the future relationship between Federal and State agencies. The objectives of this assessment were: (1) To determine the feasibility of continuing the program, (2) to determine ways to improve the process, (3) to identify cost to States for the review, (4) to identify benefits to the States, and (5) to identify benefits to USOE. Utilizing a structured interview approach, Sierra Planning and Research Associates (SPRA) contacted personnel in 5 of the 13 States which had been reviewed by MERC. SPRA also interviewed personnel in six regional offices and various personnel from the central USOE. Additionally, SPRA observed the MERC review in Idaho. A total of 87 persons were interviewed by SPRA, and data from these various sources yielded 14 recommendations which are categorized as follows: (1) The MERC process should be better organized, (2) communications should be improved among all personnel, (3) the MERC process should be reviewed periodically to remove or alter unsuitable items, and (4) the process should be systematized through the development and usage of a procedures manual. The general conclusion of the investigators is that the MERC process should be continued on a regular basis as practically all the people interviewed held the concept of MERC in esteem. (Author/HD)

## FINAL REPORT

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MERC Report: State Management Evaluation  
Reviews for Compliance

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## PREFACE.

### Acknowledgements

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Sierra Research and Planning investigators received excellent cooperation from Central Office, Regional Office, and state personnel. Directors of Vocational Education in Maine, New Jersey, Iowa, Colorado, and the Commonwealth of Puerto Rico extended the services of their departments so that profitable data concerning the MERC process could be gathered and utilized for this assessment.

We wish to express our appreciation for the time and candor of the 87 respondents who made this report possible.

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## CHAPTER 1

### INTRODUCTION

This process assessment has been conducted to determine the effectiveness of the procedure used by the Bureau of Occupational and Adult Education, USOE, in conducting State Management Evaluation Reviews for Compliance (MERC) with federal legislation and regulations governing public vocational and adult education programs. In order to assure that the continuation of the Management Evaluation Review be of greatest value to the future relationship between federal and state agencies, this evaluation of the process at the initial stages of implementation was conducted.

On September 17, 1976, a proposal to assess the MERC process was submitted to the Bureau of Occupational and Adult Education, USOE, by the Sierra Planning and Research Associates (SPRA), and on October 1, 1976, this assessment proposal was awarded to SPRA, a private consulting firm.

As shown in this report, the results of this assessment are generally supportive of the MERC process. The findings and recommendations are given to further enhance future MERC activities.

#### Scope of the Assessment

To date, a review for compliance has been conducted by MERC in 11 states, Puerto Rico, and the Virgin Islands. Four of these states and Puerto Rico were selected for investigation by SPRA. Additionally, personnel in regional offices and the central office were interviewed so that three populations, or 87 persons, were contacted for this investigation: State, Regional, and U. S. Office. In addition, the principal investigator accompanied the MERC team in the review at Boise, Idaho on November 14, 1976.

Specifically, SPRA investigators made the following site visits:

1. Regional Offices at Seattle, New York, Boston, Kansas City, Denver, and San Francisco.
2. State Offices at San Juan, Puerto Rico; Augusta, Maine; Trenton, New Jersey; Des Moines, Iowa; and Denver, Colorado.
3. MERC review at Boise, Idaho.

## Objectives of the Assessment

The overall objective of this assessment was to evaluate the MERC process and to provide a basis for recommendations which may be implemented through state management evaluations prepared by forthcoming legislation.

Specifically, the objectives of this assessment are:

1. Assess the State Management Evaluation Reviews for Compliance (MERC) to determine the relative soundness and feasibility of continuing the program.
2. Determine ways in which the MERC process can be improved.
3. Identify state costs in preparing for, and participating in, the MERC program.
4. Identify the benefits to the states as the result of the MERC visits already conducted.
5. Identify the benefits of the MERC review to the USOE.

## Overview of the Assessment

In the following chapters the procedures of this assessment are described; an analysis of the results of the findings is given; conclusions, which are drawn from the data, are made; and recommendations are given to support and enhance the MERC process.

## CHAPTER 2

### PROCEDURE OF THE ASSESSMENT

The procedure for conducting this assessment was personal contact with Central Office, Regional, and State personnel, utilizing an interview/questionnaire form. Those interviewed were persons who had participated in MERC reviews. Additionally, the principal investigator accompanied the MERC team on the review at Boise, Idaho in order to obtain first-hand knowledge of the implementation and operation procedures of the MERC process.

In addition to the field work, investigators reviewed the documentation of MERC procedures and reports.

#### Preparation of Forms

In order to assure consistency in the conduct of the interviews, two questionnaires were developed by SPRA. One questionnaire was designed for Central Office and Regional Office personnel who had conducted MERC reviews, and a second questionnaire was developed which would be appropriate for state personnel who had been reviewed by MERC.

Items of the questionnaires were designed to elicit responses concerning the purposes of MERC, scheduling, procedures, training and conduct of MERC teams, consistency between exit and final reports, and the overall attitude toward the purpose and processes of this type of review. Questions were constructed to force a "yes" or "no" response to items and to rate the quality of "yes" responses as "good," "fair," or "poor." These forms were approved by the USOE.

In order to assure the clarity and useability of the questionnaire, Mr. Courtney Riley, State Director of Vocational Education, arranged to field test the questionnaires with appropriate Nevada State Department personnel. As a result of this field test, some revisions were made in the wording of questions.

#### Site Visitations

Investigator Huber made contact with 21 Central Office personnel and interviewed 20 federal MERC participants from six Regional Offices in order to determine the effectiveness of the program from the federal point of view based on their experience as MERC team members.



Investigators Davis and Trout arranged through state directors to interview state MERC participants in four states and Puerto Rico. These site visitations were conducted in order to verify final reports and findings, and to determine the effectiveness of the program. A total of 46 state personnel was interviewed by Drs. Davis and Trout.

Participation in MERC Visit: In order to obtain first-hand knowledge of the implementation and operation of the MERC process, principal investigator Davis met with a representative from the Central Office and the Associate Regional Commissioner in Seattle prior to the Idaho pre-review. The next day investigator Davis, Central Office and Regional Office personnel met with the State Director and his staff in Boise, Idaho in a pre-review meeting to provide the state staff with the procedures which would be used during the review. Three weeks later the review was made, and the MERC team carried out the activities necessary to measure for compliance. Principal investigator Davis was thus able to observe first-hand the review procedure which provided an excellent view of the entire process.

#### Review of Documents

The OE internal documents were found to be adequate; however, there appears to be a lack of coordination between the various documents developed by Adult Education personnel, CETA personnel, and other Central Office personnel. Each program has developed statements of MERC principles, process profiles, and process recommendations which do not appear to receive proper attention.

Some final report documents were reviewed and the format was adequate to provide states with data required to direct them toward compliance within a workable time frame. However, a considerable lag was observed in returning the MERC reports in final form to the states.

#### Ordering of Findings

Responses of completed interview forms were tabulated and total responses and percent of responses to each item were calculated. Three populations and several sub-populations were identified for analysis and reporting of responses as follows:

1. Central Office Personnel
2. Regional Office Personnel
  - (a) Adult Education Personnel in Central Office and Regional Offices
3. Total State Personnel
  - (a) Colorado Personnel
  - (b) Iowa Personnel



- (c) Maine Personnel
- (d) New Jersey Personnel
- (e) Puerto Rico Personnel

The results of these interviews are reported on a per item basis in Chapter 3 of this report.

## CHAPTER 3

### FINDINGS OF THE ASSESSMENT

In this chapter is a report of the findings of this assessment of the MERC process. These findings are shown by an item analysis of the responses of the populations (N=87), and the comments of these respondents.

#### Description of the Populations

Central Office Personnel: The 21 persons interviewed in this population include one representative of the National Advisory Board, three CETA personnel, four representatives from adult education, and two representing Title IX.

Regional Office Personnel: The 20 interviews conducted for this population include four persons in Region I, three in Region II, three in Region VII, five in Region VIII, three in Region IX, and two in Region X.

Adult Education Personnel: Of the areas represented by personnel interviewed in the Central Office and the six Regional Offices, only those in Adult Education were of sufficient number (N=8) to warrant separate analysis.

Personnel in State Offices: The total state population of 46 is made up of eight persons in Colorado, six in Iowa, 12 in Maine, eight in New Jersey, and 12 in Puerto Rico.

#### Item Analysis of Interview Items

The number and percent of responses to each item were calculated in order to analyze the findings of this assessment. Yes responses were rated "good," "fair," or "poor" and the percent of these ratings was calculated from the number responding yes. No response and not applicable responses were combined and the percent of these responses was also calculated. All percentages were rounded to the nearest whole number.

Responses of Central Office Personnel: All responses of this population (N=21) are given in Table 1, Appendix C. Following are responses which are of particular significance.

Item 1: "Was the MERC review team trained in a manner to adequately determine compliance?"

90 percent answered yes to this question, and of these 19 respondents less than half (47 percent) rated the training as good.

Item 2: "Was the agenda used for MERC appropriate for the tasks?"

90 percent answered yes to this question, and of these 19 respondents 58 percent rated the agenda good.

Item 3: "Were other MERC team members courteous and professional in their approach to the tasks?"

100 percent answered yes to this question, and of these 21 respondents 76 percent rated the team's approach as good.

Item 4: "Was the composition of the MERC team members adequate for the job to be accomplished?"

100 percent answered yes to this question, and of these 21 respondents 52 percent rated the adequacy of the team as good.

Item 5: "Was there an adequate number of persons in the review teams who were representative of regional, state, and national personnel?"

100 percent answered yes to this question, and of these 21 respondents 81 percent rated the number and representation of the team as good.

Item 6: "Did MERC team members you dealt with know what they were to do to carry out their role efficiently?"

86 percent answered yes to this question, and of these 18 respondents 61 percent rated the efficiency of the team as good.

Item 7: "Was the review team forthright in disclosures of problems where compliance was doubtful?"

90 percent answered yes to this question, and of these 19 respondents 84 percent rated the forthrightness of the team as good.

Item 8: "Did the review team allow enough time to determine compliance?"

90 percent answered yes to this question, and of these 19 respondents less than half (47 percent) rated the time allotment as good.

Item 9: "Did the review team divide its efforts to adequately cover each area being evaluated?"

95 percent answered yes to this question, and of these 20 respondents 70 percent rated the efforts to cover each area as good.

Item 10: "Were you given an orientation prior to the MERC visit?"

95 percent answered yes to this question, and of these 20 respondents less than half (45 percent) rated the pre-orientation as good.

Item 11: "Did the questions used by MERC really get at the intent of the legislation?"

81 percent answered yes to this question, and of these 17 respondents 65 percent rated the questions used by MERC as good.

Item 12: "Were MERC procedures flexible enough to recognize variations in the governance of vocational education across states?"

90 percent answered yes to this question, and of these 19 respondents 74 percent rated the flexibility of the MERC procedures as good.

Item 13: "Were state staff members sufficiently oriented to review process and procedures in their areas prior to review visit?"

80 percent answered yes to this question, and of these 19 respondents less than half (42 percent) rated the prior orientation of the state staff as good.

Item 14: "Did the state director provide sufficient leadership in order to aid in adequate preparation for compliance determination?"

90 percent answered yes to this question, and of these 19 respondents 74 percent rated the leadership of state director as good.

Item 15: "Did the co-chairperson give MERC team members adequate time to make a thorough review of the areas for which they were responsible?"

95 percent answered yes to this question, and of these 20 respondents 80 percent rated the adequacy of time given by the co-chairperson to team members as good.



Item 16: "Were the secretarial services adequate for the review activities?"

81 percent answered yes to this question, and of these 17 respondents 76 percent rated the adequacy of the secretarial services as good.

Item 17: "Were there adequate materials on hand for you to carry out your job as a MERC team member?"

95 percent answered yes to this question, and of these 20 respondents 70 percent rated the adequacy of materials for team members as good.

Item 18: "Are the time provisions for correct or non-compliance flexible enough to provide for unique situations, laws, organization, and policies?"

95 percent answered yes to this question, and of these 20 respondents 60 percent rated the time provisions to meet compliance in unique situations as good.

Item 19: "Do you agree with the findings and recommendations of the MERC draft report?"

86 percent answered yes to this question, and of these 18 respondents 67 percent rated their agreement with the draft report as good.

Item 20: "Was there sufficient time to prepare the exit report on-site?"

76 percent answered yes to this question, and of these 16 respondents 50 percent rated the time to prepare the exit report on-site as good.

Item 21: "Was there sufficient time to prepare the final report?"

91 percent answered yes to this question, and of these 11 respondents most (45 percent) rated the sufficiency of time to prepare the final report as poor. (States had not received the final report.)

Item 22: "Was the technical assistance available from Regional USOE to assist states in reaching compliance?"

86 percent answered yes to this question, and of these 18 respondents most (44 percent) rated the technical assistance from regional to assist in reaching compliance as fair.

Item 23: "Were the on-site MERC logistical arrangements suitable?"

100 percent answered yes to this question, and of these 21 respondents 81 percent rated the suitability of the logistical arrangements as good.

Responses of Personnel in Regional Offices: All responses of this population (N=20) are given in Table 2, Appendix C. Following are significant findings.

Item 1: "Was the MERC review team trained in a manner to adequately determine compliance?"

65 percent answered yes to this question, and of these 17 respondents 71 percent rated the training as good.

Item 2: "Was the agenda used for MERC appropriate for the tasks?"

95 percent answered yes to this question, and of these 19 respondents 74 percent rated the agenda as good.

Item 3: "Were other MERC team members courteous and professional in their approach to the tasks?"

100 percent answered yes to this question, and of these 20 respondents 95 percent rated the team's approach as good.

Item 4: "Was the composition of the MERC team members adequate for the job to be accomplished?"

95 percent answered yes to this question, and of these 19 respondents 89 percent rated the adequacy of the team as good.

Item 5: "Was there an adequate number of persons in the review teams who were representative of regional, state, and national personnel?"

100 percent answered yes to this question, and of these 20 respondents 80 percent rated the number and representation of the team as good.

Item 6: "Did MERC team members you dealt with know what they were to do to carry out their role efficiently?"

90 percent answered yes to this question, and of these 18 respondents most (50 percent) rated the efficiency of the team as fair.



Item 7: "Was the review team forthright in disclosures of problems where compliance was doubtful?"

95 percent answered yes to this question, and of these 19 respondents 79 percent rated the forthrightness of the team as good.

Item 8: "Did the review team allow enough time to determine compliance?"

90 percent answered yes to this question, and of these 18 respondents 67 percent rated the time allotment as good.

Item 9: "Did the review team divide its efforts to adequately cover each area being evaluated?"

100 percent answered yes to this question, and of these 20 respondents 65 percent rated the efforts to cover each area as good.

Item 10: "Were you given an orientation prior to the MERC visit?"

90 percent answered yes to this question, and of these 18 respondents 78 percent rated the pre-orientation as good.

Item 11: "Did the questions used by MERC really get at the intent of the legislation?"

90 percent answered yes to this question, and of these 18 respondents 83 percent rated the questions used by MERC as good.

Item 12: "Were MERC procedures flexible enough to recognize variations in the governance of vocational education across states?"

90 percent answered yes to this question, and of these 18 respondents 56 percent rated the flexibility of the MERC procedure as good.

Item 13: "Were state staff members sufficiently oriented to review process and procedures in their areas prior to review visit?"

90 percent answered yes to this question, and of these 18 respondents 72 percent rated the prior orientation of the state staff as good.

Item 14: "Did the state director provide sufficient leadership in order to aid in adequate preparation for compliance determination?"

90 percent answered yes to this question, and of these 18 respondents 83 percent rated the leadership of the state director as good.

Item 15: "Did the co-chairperson give MERC team members adequate time to make a thorough review of the areas for which they were responsible?"

85 percent answered yes to this question, and of these 17 respondents 82 percent rated the adequacy of time given by the co-chairperson to team members as good.

Item 16: "Were the secretarial services adequate for the review activities?"

90 percent answered yes to this question, and of these 18 respondents 78 percent rated the adequacy of the secretarial services as good.

Item 17: "Were there adequate materials on hand for you to carry out your job as a MERC team member?"

95 percent answered yes to this question, and of these 19 respondents 89 percent rated the adequacy of materials for team members as good.

Item 18: "Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?"

90 percent answered yes to this question, and of these 18 respondents 83 percent rated the time provisions to meet compliance in unique situations as good.

Item 19: "Did you agree with the findings and recommendations of the MERC draft report?"

85 percent answered yes to this question, and of these 17 respondents 94 percent rated their agreement with the draft report as good.

Item 20: "Was there sufficient time to prepare the exit report on-site?"

95 percent answered yes to this question, and of these 19 respondents 74 percent rated the time to prepare the exit report on-site as good.

Item 21: "Was there sufficient time to prepare the final report?"

85 percent answered yes to this question, and of these 17 respondents 59 percent rated the sufficiency of time to prepare the final report as good.

Item 22: "Was technical assistance available from Regional USOE to assist states in reaching compliance?"

95 percent answered yes to this question, and of these 19 respondents 89 percent rated the technical assistance from regional to assist in reaching compliance as good.

Item 23: "Were the on-site MERC logistical arrangements suitable?"

100 percent answered yes to this question, and of these 20 respondents 90 percent rated the suitability of the logistical arrangements as good.

Responses of Adult Education Personnel: All responses of this population (N=8) are shown as Table 3, Appendix C. Following are important findings.

Item 1: "Was the MERC review team trained in a manner to adequately determine compliance?"

88 percent answered yes to this question, and of these seven respondents less than half (43 percent) rated the training as good.

Item 2: "Was the agenda used for MERC appropriate for the tasks?"

75 percent answered yes to this question, and of these six respondents 67 percent rated the agenda as good.

Item 3: "Were other MERC team members courteous and professional in their approach to the tasks?"

100 percent answered yes to this question, and of these eight respondents 88 percent rated the team's approach as good.

Item 4: "Was the composition of the MERC team members adequate for the job to be accomplished?"

88 percent answered yes to this question, and of these seven respondents 86 percent rated the adequacy of the team as good.

Item 5: "Was there an adequate number of persons in the review teams who were representative of regional, state, and national personnel?"

100 percent answered yes to this question, and of these eight respondents 75 percent rated the number and representation of the team as good.

Item 6: "Did MERC team members you dealt with know what they were to do to carry out their role efficiently?"

75 percent answered yes to this question, and of these six respondents 50 percent rated the efficiency of the team as good and 50 percent rated the efficiency fair.

Item 7: "Was the review team forthright in disclosures of problems where compliance was doubtful?"

100 percent answered yes to this question, and of these eight respondents 75 percent rated the forthrightness of the team as good.

Item 8: "Did the review team allow enough time to determine compliance?"

100 percent answered yes to this question, and of these eight respondents 50 percent rated the time allotment as good and 50 percent rated the time allotment as fair.

Item 9: "Did the review team divide its efforts to adequately cover each area being evaluated?"

88 percent answered yes to this question, and of these five respondents 71 percent rated the efforts to cover each area as good.

Item 10: "Were you given an orientation prior to the MERC visit?"

88 percent answered yes to this question, and of these seven respondents less than half (43 percent) rated the pre-orientation as good.

Item 11: "Did the questions used by MERC really get at the intent of the legislation?"

88 percent answered yes to this question, and of these seven respondents 57 percent rated the questions used by MERC as good.

Item 12: "Were MERC procedures flexible enough to recognize variations in the governance of vocational education across states?"

63 percent answered yes to this question, and of these five respondents 60 percent rated the flexibility of the MERC procedure as good.

Item 13: "Were state staff members sufficiently oriented to review process and procedures in their areas prior to review visit?"

63 percent answered yes to this question, and of these five respondents less than half (40 percent) rated the prior orientation of the state staff as good.

Item 14: "Did the state director provide sufficient leadership in order to aid in adequate preparation for compliance determination?"

75 percent answered yes to this question, and of these six respondents 67 percent rated the leadership of the state director as good.

Item 15: "Did the co-chairperson give MERC team members adequate time to make a thorough review of the areas for which they were responsible?"

88 percent answered yes to this question, and of these seven respondents 100 percent rated the adequacy of time given by the co-chairperson to team members as good.

Item 16: "Were the secretarial services adequate for the review activities?"

80 percent answered yes to this question, and of these seven respondents less than half (43 percent) rated the adequacy of the secretarial services as good.

Item 17: "Were there adequate materials on hand for you to carry out your job as a MERC team member?"

88 percent answered yes to this question, and of these seven respondents 57 percent rated the adequacy of materials for team members as good.

Item 18: "Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?"

100 percent answered yes to this question, and of these eight respondents 75 percent rated the time provision to meet compliance in unique situations as good.

Item 19: "Did you agree with the findings and recommendations of the MERC draft report?"

75 percent answered yes to this question, and of these six respondents 83 percent rated their agreement with the draft report as good.

Item 20: "Was there sufficient time to prepare the exit report on-site?"

88 percent answered yes to this question, and of these seven respondents 71 percent rated the time to prepare the exit report on-site as good.

Item 21: "Was there sufficient time to prepare the final report?"

50 percent answered yes to this question, and of these four respondents only 50 percent rated the sufficiency of time to prepare the final report as good.

Item 22: "Was technical assistance available from Regional USOE to assist states in reaching compliance?"

100 percent answered yes to this question, and of these eight respondents only 38 percent rated the technical assistance from regional to assist in reaching compliance as good.

Item 23: "Were the on-site MERC logistical arrangements suitable?"

100 percent answered yes to this question, and of these eight respondents 88 percent rated the suitability of the logistical arrangements as good.

Responses of the Personnel in all State Offices: The responses of the personnel in all states are shown as Table 4, Appendix C. All responses of the states interviewed in this assessment are given as: Table 5, Colorado; Table 6, Iowa; Table 7, Maine; Table 8, New Jersey; and Table 9, Puerto Rico. Following are significant findings of the combined states responses (total N=46).

Item 1: "Did you understand the purposes of MERC?"

98 percent answered yes to this question, and of these 45 respondents 84 percent rated their understanding of the purposes of MERC as good.

Item 2: "Did you understand the basis for determining compliance?"

96 percent answered yes to this question, and of these 44 respondents 64 percent rated their understanding of the basis for determining compliance as good.

Item 3: "Did you understand that the purpose of MERC was for determining compliance and not quality?"

89 percent answered yes to this question, and of these 41 respondents 88 percent rated their understanding that MERC was not to determine quality as good.

Item 4: "In your opinion, were the MERC review teams competent to adequately determine compliance?"

98 percent answered yes to this question, and of these 45 respondents 84 percent rated the competence of the team to determine compliance as good.

Item 5: "Were MERC team members courteous and professional in their approach to the task?"

100 percent answered yes to this question, and of these 46 respondents 98 percent rated the courtesy and professionalism of the team as good.

Item 6: "Was the size of the MERC review team adequate for the job to be accomplished?"

91 percent answered yes to this question, and of these 42 respondents 86 percent rated the adequacy of the size of the team as good.

Item 7: "Was the review team representative of regional, state, and national personnel?"

83 percent answered yes to this question, and of these 38 respondents 76 percent rated the representation of the team as good.



Item 8: "Did MERC team members you dealt with know what they were to do to carry out their role efficiently?"

91 percent answered yes to this question, and of these 42 respondents 74 percent rated the efficiency of the team as good.

Item 9: "Was the review team forthright in disclosures of problems where compliance was doubtful?"

91 percent answered yes to this question, and of these 42 respondents 83 percent rated the forthrightness of the team as good.

Item 10: "Did the review team allow enough time to determine compliance?"

93 percent answered yes to this question, and of these 43 respondents 74 percent rated the time allowed to determine compliance as good.

Item 11: "Did the review team divide its efforts to cover the evaluation in your area?"

83 percent answered yes to this question, and of these 38 respondents 84 percent rated the efforts to cover their area as good.

Item 12: "Were you given sufficient notice in advance of the review?"

100 percent answered yes to this question, and of these 46 respondents 87 percent rated the advance notice time as good.

Item 13: "Did you have a pre-review meeting with the MERC team?"

63 percent answered yes to this question, and of these 29 respondents 83 percent rated the pre-review meeting as good.

Item 14: "In the pre-review meeting, were you given enough information to prepare you for MERC?"

63 percent answered yes to this question, and of these 29 respondents most (52 percent) rated the amount of information given at the pre-review meeting as fair.

Item 15: "In the pre-review meeting, did you learn exactly why the MERC activity was being undertaken?"

61 percent answered yes to this question, and of these 28 respondents 79 percent rated their understanding of the reason for the MERC activity as good.

Item 16: "Were you given a list of the compliance items for review prior to a MERC visit?"

91 percent answered yes to this question, and of these 42 respondents 83 percent rated being given a list of compliance items prior to review as good.

Item 17: "Was the USOE video-tape shown on the first day of the MERC review helpful?"

72 percent answered yes to this question, and of these 33 respondents only 52 percent rated the helpfulness of the video-tape as good.

Item 18: "Were you given sufficient time during the MERC visit to discuss your area of responsibility concerning compliance?"

85 percent answered yes to this question, and of these 39 respondents 79 percent rated the time given to discuss compliance as good.

Item 19: "Were you provided with examples or specific definitions of compliance?"

80 percent answered yes to this question, and of these 37 respondents 58 percent rated the provision of examples as good.

Item 20: "Were the questions asked by the MERC team appropriate for determining compliance with the regulations concerning your work area?"

89 percent answered yes to this question, and of these 41 respondents 78 percent rated the appropriateness of questions asked by the team as good.

Item 21: "Did the questions used by MERC really get at the intention of the legislation?"

87 percent answered yes to this question, and of these 40 respondents 73 percent rated the questions as good.

Item 22: "Are MERC procedures flexible enough to recognize variations in the governance of vocational education across your state?"

85 percent answered yes to this question, and of these 39 respondents 79 percent rated the flexibility of procedures as good.

Item 23: "Was the MERC agenda for the week appropriate for the tasks?"

91 percent answered yes to this question, and of these 42 respondents 79 percent rated the appropriateness of the agenda as good.

Item 24: "Has the final report been received from USOE?"

89 percent of all respondents answered no to this question.

Item 25: "Did you receive the final report in adequate time to correct compliance deficiencies?"

23 percent of all respondents answered no to this question.

Item 26: "Are the exit report and final report essentially the same?"

67 percent of all respondents answered no to this question.

Item 27: "Were follow-up statements in the exit report concerning our need to provide information on compliance clear and attainable?"

85 percent answered yes to this question, and of these 39 respondents 62 percent rated the clarity of follow-up statements good.

Item 28: "Did you agree with the findings and recommendations of the MERC exit report?"

87 percent answered yes to this question, and of these 40 respondents 75 percent rated their agreement with the exit report as good.

Item 29: "Were you given a review of the exit report before the MERC team departed?"

74 percent answered yes to this question, and of these 34 respondents 85 percent rated receiving a review of the exit report as good.

Item 30: "Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?"

61 percent answered yes to this question, and of these 28 respondents 57 percent rated the time provisions flexible enough to provide for unique situations as good.

Item 31: "Is technical assistance available from Regional USOE to assist states in reaching compliance?"

70 percent answered yes to this question, and of these 32 respondents 66 percent rated the availability of assistance as good.

Some weaknesses of the process are apparent in these responses. The training and efficiency of the team was rated as generally fair by Central Office and Regional Office personnel, and technical assistance from Regional USOE to states would seem to need improvement.

Central Office respondents are divided on the amount of time needed to prepare the exit report on-site.

All populations rate the pre-orientation meetings as needing improvement. The state personnel feel that more information is needed at this meeting, and there is general agreement that the video tape presentation needs to be upgraded.

The states had not received the final report and could not respond to items concerning this report. State personnel also feel that there needs to be more flexibility for correcting non-compliance in unique situations.

However, it is most apparent that the number and make-up of the teams was good. Likewise, the conduct of the teams was courteous and forthright. The agenda allowed the team to cover each area adequately. The questions used by MERC are good as they reflect the intent of the legislation.

State personnel understood the purposes of MERC and felt they had received sufficient notice in advance of the review, and were given a good list of compliance items prior to the review.

## Comments of the Respondents

Part of the questionnaire included open-end questions which were designed to elicit opinions and suggestions regarding the MERC process. Respondents were asked to: "Please answer the following questions so that areas of change in MERC procedures may be implemented where necessary." Following are the comments given by each population to these questions.

Question #1: What are the two most important changes that should be made to allow the MERC procedure to do a better job?

### Comments of Central Office Respondents

If AQEC is to remain a bureau-level institution, then the administrative responsibility should be at that level for all the Appellate Commission level and not at the division level (DUTEL) when other divisions and units (AI, AEC, etc.) involved. The authority and resources to operate MERC must be at the given responsibility or administrative and operational problems will occur.

Develop a uniform method of internal and field operations with sufficient flexibility to enable the system to adapt to a variety of state administrations and provide the necessary training for the professional and support personnel involved with the process. Also, once approved, prevent higher level administrators from making daily or weekly changes in the system. Build in provisions for reasonable revision of appropriate times.

Continuity in final reports and in the results to states.

Well prepared team members for each visit.

Better secretarial help.

Model MERC format in detail.

Examine documents in light of new legislation--remove items which are not pertinent to future or continuing regulations.

It appears that the present could be more production; perhaps standard procedures are needed for this phase of the operation.

Consistent staffing (too many different people get involved in a step).



It is more in line with adult education, it should be a separate course different from the rest. Also, the program office is fully capable of conducting A.E. work without special involvement of A.E.

More consistent approach by various teams. They should be coordinated in various institutions.

Focus on government team members.

Better management, that is, a stronger understanding of roles and responsibilities.

Start commitment on a sign of support - financial and human resources - to the institution.

There is a commitment to a concept which is not subject to commitment to the program. There needs to be coordination to the time and resources necessary to be a complete job. And how the program is being understood and lack of continuity.

Ministry needs to be expanded to include evaluation of the quality of program.

Designation of staff to complete each A.E. beginning with the initial contract with the government until the final report is completed.

Need to include financial arrangements for range of staff time.

Better training of the staff in the program.

Better supervision of the staff to know what is going on in the field.

Adjust to alternative management of program. The program should be able to adapt to the situation in the field.

Staff should be prepared to have numbers available in order to function.

Intention to have a more complete program of staff training.

Need to have a stronger focus on the program.

A program office should be established.

The team should have a leader experienced in various programs and have strong skills for making proposals.



Have adequate clerical staff assigned for each MSRC visit.  
Temporary secretarial help could be employed on-site for  
what is costs for travel and per diem.

Make fewer visits to comply with 94-487 (qualitative  
program review rather than compliance review).

Move to the new legislation.

Limit the compliance items--for more in-depth--much  
information.

25% of report have manual on final report.

Sign off at appropriate level on issues.

Improve advance preparation on audit: mention compliance  
review.

Improve system for follow-up on non-compliance and "to be  
intermediate" items.

See that the no-visit team has the name of the grantee.  
AF state director and that he/she is present at the visit.

See that the preparation of the state department on is to  
identify documentation. Disinfects the AF director.

Assure that states know exactly what is meant by compliance  
disinfects--saves a great deal of time.

Not have more than one member on a team who has not had  
experience in a MSRC.

#### Comments of Regional Office Respondents:

The MSRC seems to have been established to develop data which  
can verify to the congressional committee that the letter of  
law is being fulfilled at a minimum level. Since administra-  
tion of the program has been delegated to the regional of-  
fice, the function of the majority of participants from  
Washington is to learn to know what is going on.

Eliminate MSRC and replace with an in-depth program review.

Have the program conducted by a regional office team with  
appropriate representation from other state agencies and  
possibly key locals with the major objective being to improve  
the operation and state grant program. One representative  
from Washington office would

A quality factor must be added if the procedure is to have  
any positive long range effect.

The items to be considered must not include items which are clearly fiscal audit questions. The type of evidence reviewed does not lend itself to fiscal audits.

Final reports should be made on a timely basis.

Some questions need to be revised.

To prepare a document on the MERC process and philosophy so state agency personnel and team members understand and uniformity exists among the state personnel. (For example, compliance often cannot be determined without a local educational agency check--compliance is then based on the evidence cited only.)

In-depth training at regional project officers meeting.

Review areas to be looked at in light of new act. Speed up report and follow-up.

Local on-site evaluation for program quality.

Cut down on number of redundant questions.

Make sure that the instrument used is the same as the instrument previously used with the state on the initial visit.

From the history obtained to date, schedule team activities to provide more efficient use of manpower.

The final report from OE should be prepared and submitted to the state within four weeks.

Make sure every person in the State Department of Vocational Education receives and is knowledgeable of the questions that will be asked. Some questions were added that the staff didn't have in one state.

Determine a procedure that would help team to determine quality of compliance.

Do it often enough so that states would know fairly early if they are out of compliance.

Consistency in procedures.

Co-chairman should also participate in pre-state visitation.

MERC should have more time for orientation prior to review for new members.

By either making the whole effort a joint evaluation between vocational education and adult education or separate them. As it has been (even to the extent of this questionnaire), the whole process was done for vocational education with adult education brought in as an afterthought. I disapprove of this whole approach.

Modification of the MERC instrument to insure clear interpretation of the rules and regulations in order to eliminate possible misunderstanding on the part of the state participants as to the exact intent of each item.

Wherever possible, involve state personnel in another state's review for pre-orientation.

All states should have been given the opportunity for self-evaluation that the last three of mine were given.

Title IX should be done with a representative of this division.

Increased involvement of AE "team" members in all stages of planning and development.

- On-going MERC team with the same individuals involved in the reviewing.

Insistence on having the Executive Director and/or Chairman of Advisory Councils respond to questions--not the State Director.

Improve coordination between adult and vocational programs, especially in agenda and orientation.

Improve procedure for getting out the final report.

The final report should be issued on exit.

Adequate technical assistance and follow-up should be given.

A judgment of quality in instructional programs should be rendered.

Expand the compliance items to adequately cover the law and regulations.

Get the final report back to the state in 30 days from the visit.

MERC should comply with their timelines!

### Comments of State Respondents:

Return final report on time.

Provide more time to programs.

Have a post-meeting with MERC.

I would assign more personnel for this kind of evaluation in order to have plenty of time to present the items required by MERC.

To increase the size of the team.

To include in the methodology site visits to local schools.

The MERC procedure should be used, at least, every two years.

Make the MERC more frequently.

Give participation to more members of the staff.

Give more time in performing these performance surveys so as to discuss in full all aspects of them.

Schedule arrangements.

Time for reports to be received.

No recommendation. I felt that the review was well planned and organized.

A clear understanding of what they are looking for.

Provide greater flexibility in relation to state and local laws and regulations.

Clarification in MER compliance statements to reflect the intent of the law, i.e., with regard to a statement in the legislation which states "may" rather than "will"--this obviously cannot be a yes or no response.

Less time. Smaller staff.

That the team be there to help the state show compliance.

It takes a lot of time to prepare for.

More time for clarification of compliance items and intent interpretations in preview meeting.

Ongoing procedural methods for determining compliance, i.e., more frequent communications by mail on a fiscal year basis.

Provide for a better compliance check at the level of actual program operations (local) in addition to the evaluation of administrative requirements.

Include interviews with or questionnaires for lower level staff.

MERC forms were very difficult to read and reproduction of forms made reading almost impossible. Charge should be made in the type for clarity of reading and reproduction.

Program specialists should be given the opportunity to meet with the team to know more about the process and be able to be a part of the process.

The printing of the forms used in the MERC was of poor quality and contained a few errors. These forms should be professionally printed.

The questions asked on the forms should relate more closely to the legislation/regulations.

Show the video tape earlier--at the first meeting.

Evidence that supports a number of questions should be cross-referenced.

More flexibility and understanding. More advance notice.

The entire process in terms of paperwork needs to be looked at. The printing and reproduction of papers were poor.

The process takes a full week out of the work schedule of the State Director. The schedule needs to be looked at in terms of state day-to-day activities.

MERC team should have better understanding of each state before review is made.

Satisfied with the approach and procedures followed by USOE.

Better presentation on: purpose, what is done with data at O.E., people knowledgeable about specific area investigated on MERC team.

Don't drag review out to four days when two will suffice.

Should look at quality of programs.

Review should be a little longer and in more detail.

Better meeting area, especially during the working portion of the review.

- Train team members better so they know what to look for. Oftentimes I had to say, "If I were determining compliance, I would be looking for this." I had to provide leadership rather than the team.

More advanced notice.

Better explanation in advance of role and purpose of team and visit.

Organize the MERC team according to state structure and not vice versa--would save a number of teams having to go to numbers of different staff persons.

Supply a final report.

Hold preview meeting.

Strengthen the team by using more state agency people and regional people who are familiar with state operation.

- Be more specific in the kinds of documentation needed to determine compliance.

Additional staff so that more than one person may spend equal time with each section, rather than the spot-check approach.

Include more comprehensive pre-material regarding what materials need to be supplied to substantiate compliance.

Basically very positive!

One USOE staff member put on a hard line approach and seemed somewhat oblivious to state needs and procedures.

We felt the MERC procedures were still in the formation stage. Improvements were noted and were to be adopted by the MERC teams later.

Sixty-day follow-up with final final report a necessity--to date no response has been made to our chief state school officer.

Verification of compliance.

The opportunity to share and compare attitudes, opinions and value judgments.

Submit a final report within a month or two of the evaluation visit.

Total involvement by regional office staff.

Question #2: As a MERC team member, please state how you could have been more adequately prepared to carry out your MERC activities.

Comments of Central Office Respondents:

Designate responsibility for the program to a single capable (this is a must) person.

It would be easier and more efficient to work in the program if operational direction stemmed from sensible planning.

Better inservice training.

To have been involved with a specific report (or tape recording) of all the inservice and pre-site visit activities. (Communications)

I could have had more background data.

Use a previous MERC visit report as a basis for orientation and clarification of tasks.

Pre-visit meeting of team (in Washington) might have prepared me better--mostly because of non-consistency of staff.

Prior to MERC the team should agree on interpretation of certain key regulations. The lack of agreement caused problems among team members.

Needed to have more time to prepare for site visit.

More time to prepare.

More and better training.

My experience was on the first MERC so it is perhaps unfair to judge it. The pre-visit briefing was inadequate. There was no consensus among team members as to the purpose of the review, or even the process.

Feel I was adequately prepared.

Matter of workload, but would like to have more time to review state's materials on file in our office.



Better instruction on what constitutes acceptable evidence of compliance. This might be best handled by developing a team member handbook showing samples of compliance evidence.

Better training prior to visit, especially on the specifics of the state and organization of its staff. Better definitions of evidence and what (and where to find) kinds of documents or convincing, real evidence.

#### Comments of Regional Office Respondents:

By having the MERC coordinated with other "intervention" activities already conducted or planned for that state.

Training for regional OE people was not provided until the evening before the MERC was to begin. Consequently, we struggled to learn the process.

We should have been provided examples of evidence to look for.

Preparation is adequate now that staff has participated in at least one MERC each.

Specific instructions and examples of minimum compliance are needed.

Earlier orientation to the process and philosophy.

Team members were asked to take items for which they had a total lack of previous understanding.

We were well prepared.

Preparation was very good--no changes recommended.

I felt comfortable in the areas I evaluated.

If I was asked to evaluate Title IX, I would have needed more training.

If I could have participated in a review in another region prior to conducting our reviews, I would have been better prepared.

Better orientation and more specific guidelines related to procedure, definitions, and better understanding by citation of selected examples.

Again, to be brought into the process as an equal sponsor.

More experience, possibly through auditing or participating in MERC activities in another region on at least one occasion prior to first experience in home region.

Since my region was completed in toto the first meeting, I was not prepared since the information was not available in advance. All others fine.

Well prepared in advance due to prior experience in monitoring for compliance periodically in the AE program.

Additional preparation would have been a waste of staff time.

As representative of Advisory Councils, and questioning only in that area, I feel the orientation was sufficient enough to carry out MERC activity.

Should have been more training of all team members prior to the visit.

Should have been more interaction with the program operators.

By participating in a MERC review.

By spending some time covering the MERC questions with team members before meeting with the state.

The MERC member should be involved from the initial stages to follow-up.

## Question #2: Was MERC helpful to you? How?

### Comments of State Respondents:

It helped us to view more adequately our weaker points so that we could be able to improve them.

It allowed for a refreshing of the rules and regulations regarding vocational technical education and the knowledge of some we had overlooked.

Any self-examination is helpful. We have changed some certification statements and applications and will change others. The main areas of improvement will be in small technical points.

Identified areas of regulation in which we were weak or needed improvement: opportunity to discuss interpretations of laws and regulations in some depth.

In preparing us for questionable interpretations regarding intent of law.

Clarifying ways and procedures as to implementation of programs, and changes that can be made to meet with compliance.

It helped me to be aware of the laws and regulations in vocational education and that our program should be in compliance with the law.

Makes the staff more familiar with rules and regulations.

Provides the chance to review all work done and determine the effectiveness of the whole educational delivery system.

Is a good tool to reevaluate what everybody is doing with their duties and responsibilities.

Helped the supervisor's staff to be aware of all the provisions of the law, as well as the prevailing rules and regulations issued in order to comply with it.

It made me more conscious of the importance of being in compliance with the law.

It makes me recognize and be more conscious of the importance of going to the law and following it when developing proposals and implementing projects.

Now I am more aware of the requirements of the law.

We were aware of the deficiencies found out and were ready to make the necessary planning for improvement. We were satisfied knowing the things we were doing in compliance with the regulations.

Point out areas that can be stressed.

Help other educators see or understand other programs objectives and tasks.

The overall team effort in determining compliance and researching supportive data as well as the recognition of areas of strengths and weaknesses in current state practices.

It gave me an opportunity to review the law applicable to my area of responsibility and to determine if the area was in compliance with the federal guidelines which are sometimes vague. It was helpful to know that our bureau was in compliance.

Review of federal legislation and Maine's activities to comply to the intent of the law.

Opportunity to have an "outsider" look in to give us a different view of dealing with the Adult Education Act.

It has nice to know my area was 100% in compliance with legislative intent.

Forced a critical internal review.

Gained a better understanding of USOE expectations regarding my program responsibilities.

Helped staff get a better handle on rules, regulations, and intent.

Some new formats and procedures have been developed that have improved the bureau's total operation.

The review got staff involved and forced them to take a look at what they were doing.

Gave the Bureau of Vocational Education a better understanding of the rules and regulations as they pertained to the Vocational Education Amendment of 1968:

In a minor way. More cognizant of laws and regulations.

I have a much better overview of the functions of USOE, region, etc. and laws pertaining to funding of programs.

Provided for review of our own records and procedures for compliance. Team acted as spot check of our operations.

It was helpful in identifying weak areas to be strengthened. Also some of the forms used prior to MERC will need to have additional space to accommodate information required for full compliance.

As a self-evaluation exercise.

It brought the broad compliance picture into better focus for me.

It motivated us to compile evidence of compliance rather than use explanation alone.

It made me review in depth the quality and quantity of my involvement.

Indicated our "shortcomings."

Preparation, self-study, follow-up, in-service, the presence of an auditor.

Caused us to look at our degree of compliance--we are still working to improve.

Built stronger relationship with USOE.

I reviewed some parts of the law and items of compliance. Therefore, we will strengthen some procedures.

Made us look at our policies and rules and sign them more carefully in light of federal law.

Reinforced the policy/procedures our agency operates within.

Directed our attention to the areas where we were deficient; provided a time frame and assistance for correction.

Preparation of the materials provided an in-depth in-service to staff with regards to legislation and compliance.

The visit pointed out our weak spots and reaffirmed our strong areas.

Clarified two compliance regulations--Iowa is changing the work-study form to comply with local commitment.

Good update and review of the '68 amendment. Made our U.S. Division review our operation. This I believe would not have occurred if the MERC team had not visited."

It provided an opportunity for an objective party to determine if, in their opinion, we were in fact in compliance with the law and rules and regulations.

We welcome this type of assistance!

The discussions during the team visit aided me in better understanding compliance items. They helped to fortify the fact that we are moving in a positive direction. They called attention to thoughts relative to what can be done to improve our activities in accordance with the intent of the legislation.

Indicated a non-compliance--assisted this office in resolving non-compliance prior to completion of exit, therefore allowing us to be in compliance with the legislation.

Generally speaking, they were professional and efficient with a very minimal of disruption to daily operations.

Question #3: How is MERC beneficial to BOAE and/or USOE?

Comments of Central Office Respondents

With adequately trained (prepared) professional personnel operating in the field, a high degree of positive public relations can be achieved between the state personnel and BOAE/USOE, i.e., OE can improve its image.

Analysis and dissemination of information acquired through USOE visits (development of trends, findings, etc.) can establish a sense of the important contribution needed in making to society. All reports for general public consumption should be easily understood and presented in a professional, attractive manner. Proper treatment could result in an improved OE image.

It gives a finding of specific areas where assistance is needed in state to more effectively administer a national program. (BOAE)

Evidence of legal compliance.

Advice to meet state staff face-to-face.

Provides background data for analysis and improvement of future evaluations.

Judge adequacy of regulations.

Provides testimony as an opportunity to observe actual state operations.

Provides documentation to support inquiries from GAO and other agencies.

Clarifies BOAE role.

It is not beneficial in any substantial way for state A.E. program; it also cuts into our DAE time and financial resources that should be used for priority activities.

I think it has improved the communications between federal and state officials. This will benefit BOAE in future endeavors.

This system of compliance review could be used by other bureaus within O.S. I think this exercise has been a most beneficial task for both O.S. and state officials.

The spin-off effect could be that state officials use the same methodology with LEA's.



the improved relations between states and central office staff.

Cooperation and coordination with NEA.

Place no delimiting line between the state and Director and his program.

Opportunity to provide staff development and "technical assistance" in the process.

How to observe the prevailing climate in the State Department, the setting in which all takes place.

Identify statutes enabling, limitations and exemplary practices in each state.

Of great value to NEA in finding problem areas.

Has surfaced questions--concerns and questionable interpretations--and as the NEA supervisor of education is along or there, it has pointed up areas where technical assistance could be helpful.

Helpful in planning the people's operations.

rather state where State Department present--the State Department all materials available and almost all were fairly complete. Legislation was excellent. NEA could proceed and still not really invade the day-to-day state position.

enable a transfer of state accountability for the expenditure of federal funds.

NE staff have to get better acquainted with the state staff and their procedures, organization and overall programs. This statute NEA to provide better services to regional and state staff, provides a base for better working relations and understanding of the state educational education system, and confidence that the provisions and purposes of the act are being addressed and in least in major parts accomplished.

which NEA to have an indication of compliance status.

Opportunity to establish rapport with state officials.

used as excellent public relations vehicle for the Department.

states in shortness coming stated in terms of clearing laws and regulations.



It is recognized that CE and the states are experimenting and have a rich understanding of areas of need.

Identification of frequency of non-compliance will influence amount of technical assistance to be provided.

Now, say in response to concerns of CE and Congress.

Further will be possible by some better strategies for the implementation of non-compliance.

Need to have varying non-compliance. It is which for them to have under the states to have their compliance.

Whereas compliance means it is not. Some staff members may be their administration against the specifier of the law or regulation.

It is recognized that CE and the states are experimenting and have a rich understanding of areas of need. It is which for them to have under the states to have their compliance. It is which for them to have under the states to have their compliance. It is which for them to have under the states to have their compliance.

It is which for them to have under the states to have their compliance. It is which for them to have under the states to have their compliance. It is which for them to have under the states to have their compliance. It is which for them to have under the states to have their compliance.

There are two areas identified which need either a policy statement or a change in the regulations. The need for additional technical assistance has been demonstrated through the CE.

It is which for them to have under the states to have their compliance. It is which for them to have under the states to have their compliance. It is which for them to have under the states to have their compliance.

Self-evaluation by states.

Need for technical assistance.

Answers CE and the states are being provided under the legislation are being provided.

Requires consistency of national office and regional in monitoring and providing technical assistance.

Requires central office knowledge of state systems and problems.

Indirectly gives BOAE opportunity to learn of exemplary activities and also identify areas for technical assistance.

Comments of Regional Office Respondents:

- I have found almost no value except to provide an experience for the uninitiated federal employee to get an opportunity to learn superficially what is happening in a state and the out-of-state team member to see a federal team in operation.

Gives all OE people a better understanding of the need for technical assistance to states.

It was, in my opinion, designed for a self-serving purpose--and that was to prove to our critics that we have done a good job in forcing the states to comply with the law. In my opinion, that was a poor reason to do the MERC's.

Brings state staff, regional staff, and headquarters staff together.

The MERC is a good review of regulations at all levels for old and new staff alike.

Points out major deficiencies of non-compliance or non-performance.

If the two states in this region where a MERC has been accomplished, there is a generally good feeling toward this effort.

Aids in headquarters (BOAE) and regional staff members working together.

Problem: The co-chairman (1 Regional - 1 Headquarters) arrangement just doesn't work if one of the co-chairmen is the coordinator. The role of the coordinator becomes one of the chairmen.

Opportunity to be on site--meet with state staff. Many items not in ~~state~~ were surfaced and discussed.

Surfaces program problem areas in need of evaluation and monitoring. Alerts Region to problem before HEW audits.

The process uncovers weaknesses in the state that are not readily obvious through the normal monitoring and technical assistance procedures. The overall look at the state operation brings out the interaction of parts of the regulations as opposed to responding to specific questions relating to an isolated situation or item.

It gives us an opportunity to work together as a team.

Assist us all to better understand the problems related to implementation by the State Board.

We are more knowledgeable of state's efforts to comply with the law and can surface problems before they are serious.

The Federal-State relationship benefits.

It not only provides compliance assurances, but also pinpoints problem areas. As a regional person, I feel I will be able to use MERC in future planning.

As a means to show legislation or GAO that we have started, as a bureau, to do the job of evaluation.

Through the experience and exercise of gathering data, reviewing regulations and considering areas of improvement on the part of state personnel, and through the resulting benefit of a better understanding and relationship between state and region.

This was a great experience for me in that it forced me to review my own responsibilities and to become more knowledgeable of the rules and regulations.

Strengthens management of program on all levels by improving communication, coordination, and cooperation of inter-governmental team.

Assures commitment of state/federal agencies to comply with legal requirements for use of federal monies as established by the U. S. Congress.

Clarifies and improves understanding of legal requirements of program.

Good rapport between USOE and the SEA was strengthened.

For BOAE--responses should indicate strengths and weaknesses in interpretation of the law and the rules and regulations pertaining to program and administration.

For USOE--responses should indicate which states still need technical assistance.

An effective means for states to improve program administration. Although this is a compliance activity, it provides states with information that can lead to program improvement.

It provides both regional and central office staff with a better picture of state operation.

My experience with the one MERC visit was positive. The compliance review also was helpful to the state and should give direction to the state VE staff in assisting LEA's.

Gives BOAE a uniform procedure for assuring each state's minimum compliance.

Gives OE method of reporting activities to DHEW and Congress.

Forces BOAE and OE regional staff to work together and reach agreement on law and regulation interpretation.

It forces BOAE (ilq.) to become involved with various state programs.

#### Responses of State Respondents:

It gives USOE an insight of how the states are operating regarding the rules and regulations to be observed.

Should and must be done more frequently if success in meeting regulations under the new law is to be attained, and thus quality of programs is to be attained.

It serves as an evaluation of services rendered.

Provides an unbiased evaluation of vocational education and the degree of accomplishment in regard with use of federal money.

It helped the MERC review team to get up-to-date information on the things that are being done in each state concerning vocational and technical education.

It is beneficial because MERC assures that the services and monies reach the right clientele.

Will help them in determining if the guidelines they sent are well interpreted and understandable. Will tell them if they need to be more specific or not.

The MERC is beneficial to the Bureau of Occupational, Adult Education in determining if the states are developing programs in compliance with the requirements of the law.

Provides feedback on program-product.

Provides USOE with overall picture of points we need for changes and/or revisions in current practices.

Allows the bureau to evaluate how well states are complying with the federal law and to identify problem areas.

It seems to be a good activity for assuring feedback to USOE and Congress.

By causing vocational education and adult education to work together as team members. It is this area I believe can be strengthened. Adult education and vocational education have many common goals and should be working together more closely.

Help federal government and USOE do better job in helping states in providing vocational education.

Gave the USOE a chance to get into the state and find out how vocational education was operating.

I am unsure. The review could be beneficial if quality of programs reviewed was examined and specific recommendations for improvement were issued to each program area.

I believe the MERC idea is a sound one but poorly implemented with a number of omissions in its design and application.

To insure that monies and resources are providing the best possible programs to help people at local level to upgrade and learn new skills and become productive members of our society.

Should identify deficiencies at an early date.

It provides the opportunity for staff from USOE to see how much each state is complying with the rules and regulations; an opportunity to see some of the difficulties encountered at the state level.

It allows them to personally ascertain the manner in which the various states comply with the federal regulations.

It should allow the Bureau to know the vast variety of activities and programs that are carried on throughout the nation. This knowledge should provide ideas for transferability from one state to another.

It gives them a realistic view of local operations.

Indicates areas of compliance as well as non-compliance.

Compliance, in-depth understanding of each state, forces the USOE staff to get out into the field to see each state first-hand.

More involvement between bureau and division heads.

This is only a guess, but it should help the staff to evaluate the compliance activities of a state. This should provide them with many ideas where their leadership is needed.

It provides an interface between states and USOE regarding problems in the delivery of vocational education at the state/local level.

Gained first-hand experience with field.

Now know areas of non-compliance and most of all the reason for non-compliance.

Gained ideas of exemplary practices.

By assuring compliance, I believe they can assure Congress that the intent of the law is being implemented.

If there is feedback on all MERC reviews, it could give a good composite of common problems found by review as well as the realization that individual states have very unique problems that need to be accommodated.

Provides a procedure for standardization.

It should give them an idea of what is going on in the states - which should help with legislation and operating policies.

Gives them an in-depth look into each state's operation and familiarizes them with unique aspects of state administration which should help them regarding interpretations, etc. of future administrative rules and regulations and in knowledgeable development of reasonable rules and regulations regarding new legislation.

I believe this allowed on-site visit, first hand contact, and articulation to occur. Since our state is located in the center of the U.S., visits by the National Bureau of Occupational, Adult Education are minimal. Our state staff and national staff got the chance to work together with the regional staff.

Provides a better insight as to what is taking place within each state, thus providing a state, regional, and national picture of the statutes of programming in each state.

Washington personnel should have a much improved picture as to what is really happening in the field.

### Estimated Cost to States

One of the objectives of this assessment is to provide an estimate of the cost to the states to prepare for and participate in a MERC review. Four of the five states visited by the investigators provided manpower and cost estimates. The data provided by these four states are as follows:

1. 531 estimated man-hours at a cost of \$5,310.00.
2. 643 estimated man-hours at a cost of \$8,037.50.
3. 200 estimated man-hours at a cost of \$2,600.00.
4. 964 estimated man-hours at a cost of \$7,604.00.

The above figures do not correlate with the size of the population of the state being interviewed in this assessment. One would normally assume that a small state would spend less time, hence less money, on the review. However, this was not the case. The state (#3) which reported 200 man-hours was a medium sized state, and the reason given for the relatively few man-hours involved was that they did not feel it was necessary to use large amounts of time in preparation for the MERC review team. Other states did use more time to prepare for the review.

## CHAPTER 4

### CONCLUSIONS AND RECOMMENDATIONS

#### Conclusions

There is no doubt that MERC should be continued. Investigators have concluded that the MERC process provides a means by which USOE, Regional, and State Offices can better assure compliance with the intent of federal legislation. The MERC concept is held in high esteem by practically all persons interviewed. It is essentially described by state people to be one of the best U. S. Office activities to be undertaken over the past years.

Investigators have found that the MERC procedure has provided a way for improvement of compliance at the state level and at the same time has brought Regional and Central Office people into the field to see first-hand the variety of problems faced by individual states which are trying to comply with national regulations.

The process in general is adequate to attain the objectives of MERC. The following recommendations are given for consideration in order to improve the MERC process. These recommendations are not given with any suggested priority.

#### Recommendations

1. A procedures manual must be developed to provide review team members with a guide for use in each state so that consistency can be attained for determining compliance and carrying through the daily review activities and exit procedures.

2. There should be a thorough in-service training program for Central Office and Regional Office personnel on the objectives of MERC and the procedures for conducting reviews.

3. There should be a director of the MERC review team instead of the present co-director structure. The director should be selected from the Central Office staff.

4. It is imperative that Central Office and Regional personnel who meet with states for pre-review activities be the same persons that meet with states during the regular review.

5. Every opportunity should be provided for a state director to be an observer of an entire state review before his state review is held.



6. A means should be provided to insure that Adult Education, Title IX, and CETA representation will be included as an integral part of each state review.

7. A thorough orientation session must be conducted for MERC team members before they go into the field.

8. A permanent central office team should be developed to carry out all future reviews.

9. It is essential that the state director be given a written statement on non-compliance items each day of the review.

10. All state MERC participants should have an opportunity to review the exit report findings concerning items of "non-compliance" and items "to be determined" before the MERC team leaves the site.

11. Each state should receive a written final report within 30 days of the review team exit.

12. A new video tape should be developed which will be appropriate for the orientation of state personnel in all programs. This orientation tape should include an overview of the purposes of MERC and utilize a variety of charts, graphs, and visuals which will better serve the entire viewing population.

13. Effort should be made by USOE staff to systematize the in-house MERC report activities and to provide adequate logistical support to produce the completed document within the recommended 30 days.

14. At least once a year, Central Office permanent review team members should identify compliance questions which should be deleted or rewritten for clarity.

APPENDIX A

Interview Form for  
Central Office and Regional Office Personnel

# MERC TEAM QUESTIONNAIRE FOR EVALUATION OF MERC PROJECT

Date \_\_\_\_\_

Identification - Please check one:

☐ Regional Office  
☐ DEW  
☐ CSEA  
☐ Adult Education

☐ Deputy Commissioner's Staff  
☐ Other (please specify) \_\_\_\_\_

Directions - Answer each of the following questions "yes" or "no." If your answer is "yes," rate your response as "good," "fair," or "poor."

Yes	No	Question	Rating		
			Good	Fair	Poor
		1. Was the MERC review team trained in a manner to adequately determine compliance?			
		2. Was the agenda used for MERC appropriate for the tasks?			
		3. Were other MERC team members courteous and professional in their approach to the task?			
		4. Was the composition of the MERC team members adequate for the job to be accomplished?			
		5. Was there an adequate number of persons in the review teams who were representative of regional, state, and national personnel?			
		6. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?			
		7. Was the review team forthright in disclosures of problems where compliance was doubtful?			
		8. Did the review team allow enough time to determine compliance?			
		9. Did the review team divide its efforts to adequately cover each area being evaluated?			
		10. Were you given an orientation prior to the MERC visit?			
		11. Did the questions used by MERC really get at the intent of the legislation?			

Yes	No	Question	Rating		
			Good	Fair	Poor
		12. Were MERC procedures flexible enough to recognize variations in the governance of vocational education across states?			
		13. Were state staff members sufficiently oriented to review process and procedures in their areas prior to review visit?			
		14. Did the state director provide sufficient leadership in order to aid in adequate preparation for compliance determination?			
		15. Did the co-chairperson give MERC team members adequate time to make a thorough review of the areas for which they were responsible?			
		16. Were the secretarial services adequate for the review activities?			
		17. Were there adequate materials on hand for you to carry out your job as a MERC team member?			
		18. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?			
		19. Did you agree with the findings and recommendations of the MERC draft report?			
		20. Was there sufficient time to prepare the draft report on-site?			
		21. Was there sufficient time to prepare the final report?			
		22. Was technical assistance available from Regional USOE to assist states in reaching compliance?			
		23. Were the on-site MERC logistical arrangements suitable?			

Please answer the following questions so that areas of change in MIRC procedures may be identified where necessary.

1. What are the two most important changes that should be made to allow the MIRC procedure to do a better job?

2. As a MIRC team member, please state how you could have been more adequately prepared to carry out your MIRC activities.

3. How is MIRC beneficial to BOAC and/or USCG?



APPENDIX B

Interview Form for States

# STATE ADOLESCENT INVESTIGATIVE AND EVALUATION BY ADULTS AT ELIMINATION OF ADULTS AT ELIMINATION OF ADULTS

Date: \_\_\_\_\_

1. In your opinion, how well did the adult investigators in your area  
perform their duties? (Please check one box.)

Very well  
Fairly well  
Fairly poor  
Very poor

2. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

3. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

4. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

5. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

6. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

7. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

8. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

9. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

10. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

11. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

12. How well did the adult investigators in your area  
perform their duties? (Please check one box.)

13. How well did the adult investigators in your area  
perform their duties? (Please check one box.)



Part III  
Present and Prospects of Review

Yes	Questions	Notes
	1. Have you ever visited a school in absence of the review?	
	2. Did you have a pre-visit meeting with the HRC team?	
	3. If the pre-visit meeting, were you given enough information to prepare you for HRC?	
	4. In the pre-visit meeting, did you bring exactly all the HRC subjects that were undertaken?	
	5. Were you given a list of the candidates' names for exchange prior to a HRC visit?	
	6. Was the HRC visit with you on the first day of the HRC review visit?	
	7. Were you given sufficient time during the HRC visit to discuss your area of responsibility concerning compliance?	
	8. Were you provided with examples or specific definitions of compliance?	
	9. Were the questions asked by the HRC team appropriate for determining compliance with the regulations concerning your work area?	
	10. Did the questions asked by HRC really not at the intent of the regulations?	
	11. Are HRC policies flexible enough to recognize variations in the governance of vocational education across your state?	
	12. Are the HRC reports for the work appropriate for the intent?	

**Part IV  
Report and Follow-Up**

Yes	No	Question	Good	Fair	Poor
		1. Has the final report been received from HSOL?			
		2. Did you receive the final report in adequate time to correct compliance deficiencies?			
		3. Are the exit report and final report essentially the same?			
		4. Were follow-up comments in the exit report concerning your need to provide information on compliance clear and attainable?			
		5. Did you agree with the findings and recommendations of the HSRC exit report?			
		6. Were you given a review of the exit report before the HSRC team departed?			
		7. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?			
		8. Is technical assistance available from Regional HSOL to assist states in reaching compliance?			

Part V  
Open End

Please answer the following questions so that areas of change in WPC procedures may be implemented where necessary.

1. What are the two most important changes that should be made to allow the WPC procedure to do a better job?

2. Was WPC helpful to you?

How?

3. How is WPC beneficial to the Bureau of Occupational, Adult Education of CSOE?

APPENDIX C

Tables

Table 1

Responses of Central Office Personnel (N=21)

Item	Yes # %	Rating of "yes" R*					
		Good		Fair		Poor	
		# %	# %	# %	# %	# %	# %
1. Was the MERC review team trained in a manner to adequately determine compliance?	19/90	9/47	7/37	3/16			
2. Was the agenda used for MERC appropriate for the tasks?	19/90	11/53	3/42	-			
3. Were other MERC team members courteous and professional in their approach to the tasks?	21/100	15/76	4/19	1/5			
4. Was the composition of the MERC team members adequate for the job to be accomplished?	21/100	11/52	7/33	3/14			
5. Was there an adequate number of persons in the review teams who were representative of regional, state, and national personnel?	21/100	17/81	3/14	-			
6. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	18/86	11/61	5/28	2/11			
7. Was the review team forthright in disclosures of problems where compliance was doubtful?	19/90	16/84	✓ 3/16	-			
8. Did the review team allow enough time to determine compliance?	19/90	9/47	3/42	1/5			

No # %	N/R # %
2/10	-
2/10	-
-	-
-	-
-	-
3/14	-
2/10	-
1/5	1/5

\*Some respondents did not rate all yes responses.

Table 1 continued

Item	Yes # %	Rating of "yes" R						No # %		N/R # %	
		Good		Fair		Poor					
		#	%	#	%	#	%				
9. Did the review team divide its efforts to adequately cover each area being evaluated?	20/95	14/70	3/15	2/10	-	1/5					
10. Were you given an orientation prior to the MERC visit?	20/95	9/45	9/45	2/10	-	1/5					
11. Did the questions used by MERC really get at the intent of the legislation?	17/81	11/65	3/18	2/12	3/14	1/5					
12. Were MERC procedures flexible enough to recognize variations in the governance of vocational education across states?	19/90	14/74	4/21	-	1/5	1/5					
13. Were state staff members sufficiently oriented to review process and procedures in their areas prior to review visit?	19/90	3/42	9/47	2/11	2/10	-					
14. Did the state director provide sufficient leadership in order to aid in adequate preparation for compliance determination?	19/90	14/74	5/26	-	2/10	-					
15. Did the co-chairperson give MERC team members adequate time to make a thorough review of the areas for which they were responsible?	20/95	16/80	4/20	-	1/5	-					

Table 1 continued

Item	Yes # %	Rating of "yes" R			No # %	N/R # %
		Good # %	Fair # %	Poor # %		
16. Were the secretarial services adequate for the review activities?	17/31	10/76	3/13	1/6	4/19	-
17. Were there adequate materials on hand for you to carry out your job as a MERC team member?	20/95	15/75	6/30	-	1/5	-
18. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	20/95	12/60	7/35	-	-	1/5
19. Did you agree with the findings and recommendations of the MERC draft report?	18/36	12/67	5/23	-	-	3/14
20. Was there sufficient time to prepare the exit report, on-site?	16/76	8/50	7/43	-	3/14	2/10
21. Was there sufficient time to prepare the final report?	11/52	3/27	2/13	3/43	5/24	5/24
22. Was technical assistance available from Regional USOE to assist states in reaching compliance?	18/86	7/39	6/44	2/11	-	3/14
23. Were the on-site MERC logistical arrangements suitable?	21/100	17/81	3/14	1/5	-	-

Responses of Personnel in Regional Offices (1997)

Item	Yes # %	Rating of "yes" %		
		Good # %	Fair # %	Poor # %
1. Was the MERC review team trained in a manner to adequately determine compliance?	17/85	12/71	4/24	1/5
2. Was the agenda used for the review appropriate for the task?	19/95	14/74	5/26	-
3. Were other MERC team members courteous and professional in their approach to the tasks?	20/100	19/95	1/5	-
4. Was the composition of the MERC team members adequate for the job to be accomplished?	19/95	17/89	2/11	-
5. Was there an adequate number of persons in the review teams who were representative of regional, state, and national personnel?	20/100	16/80	4/20	-
6. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	13/90	8/44	9/50	1/6
7. Was the review team forthright in disclosures of problems where compliance was doubtful?	19/95	15/79	4/21	-
8. Did the review team allow enough time to determine compliance?	18/90	12/67	6/33	-

No # %	NR # %
2/15	-
1/5	-
-	-
1/5	-
-	-
2/10	-
-	1/5
1/5	1/5

\*Some respondents did not rate all yes responses.





	Yes # %	Rating of "yes" R					
		Good		Fair		Poor	
		#	%	#	%	#	%
the review team divide efforts to adequately cover each area being visited?	20/100	13	65	7	35		
are you given an orientation prior to the NERC visit?	18/90	14	78	3	17	1	6
do the questions used by NERC really get at the heart of the legislation?	10/90	15	33	3	17		
are NERC procedures flexible enough to recognize variations in governance of vocational education across states?	18/90	10	56	7	39	1	6
are state staff members sufficiently oriented to new process and procedures in their areas prior to review visit?	18/90	13	72	4	22	1	6
does the state director provide sufficient oversight in order to insure adequate preparation for compliance determination?	18/90	15	83	3	17		
do the co-chairperson give NERC team members adequate time to make a thorough review of the areas for which they were responsible?	17/81	14	82	3	18		

	No # %	N/R # %
	2/10	
	1/5	1/5
		7/10
	1/5	1/5
	2/10	
	1/5	2/10

Table 2 continued

Item	Yes # %	Rating of "yes" R						No # %	N/R # %
		Good		Fair		Poor			
		#	%	#	%	#	%		
16. Were the secretarial services adequate for the review activities?	19/90	14/73	4/22	-			-	2/10	
17. Were there adequate materials on hand for you to carry out your job as a MERC team member?	19/95	17/89	1/5	1/5			1/5	-	
18. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	18/90	15/33	3/17	-			1/5	1/5	
19. Did you agree with the findings and recommendations of the MERC draft report?	17/35	16/94	1/6	-			2/10	1/5	
20. Was there sufficient time to prepare the exit report on-site?	19/95	14/74	5/26	-			-	1/5	
21. Was there sufficient time to prepare the final report?	17/35	10/59	5/29	2/12			1/5	2/10	
22. Was technical assistance available from Regional USOE to assist states in reaching compliance?	19/95	17/89	2/11	-			-	1/5	
23. Were the on-site MERC logistical arrangements suitable?	20/100	18/90	2/10	-			-	-	

Table 3

## Responses of Adult Education Personnel

(Regional and Central Offices) (N=3)

Item	Yes		Rating of "yes" R*					
			Good		Fair		Poor	
	#	%	#	%	#	%	#	%
1. Was the MERC review team trained in a manner to adequately determine compliance?	7	88	3	43	3	43	2	14
2. Was the agenda used for MERC appropriate for the tasks?	6	75	4	67	2	33	-	-
3. Were other MERC team members courteous and professional in their approach to the tasks?	8	100	7	88	-	-	1	13
4. Was the composition of the MERC team members adequate for the job to be accomplished?	7	88	6	86	-	-	1	14
5. Was there an adequate number of persons in the review teams who were representative of regional, state, and national personnel?	8	100	6	75	2	25	-	-
6. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	6	75	3	50	3	50	-	-
7. Was the review team forthright in disclosures of problems where compliance was doubtful?	8	100	6	75	1	13	-	-
8. Did the review team allow enough time to determine compliance?	8	100	4	50	4	50	-	-

No		N/R	
#	%	#	%
1/13		-	
2/25		-	
-		-	
1/13		-	
-		-	
2/25		-	
-		-	
-		-	

\*Some respondents did not rate all yes responses.

Table 3 continued

Item	Yes # %	Rating of "yes" R				No # %	N/R # %
		Good # %	Fair # %	Poor # %			
9. Did the review team divide its efforts to adequately cover each area being evaluated?	7/88	5/71	2/29	-	-	1/13	
10. Were you given an orientation prior to the MERC visit?	7/88	3/43	3/43	1/14	1/13	-	
11. Did the questions used by MERC really get at the intent of the legislation?	7/88	4/57	1/14	2/25	1/13	-	
12. Were MERC procedures flexible enough to recognize variations in the governance of vocational education across states?	5/63	3/60	1/26	-	1/13	2/25	
13. Were state staff members sufficiently oriented to review process and procedures in their areas prior to review visit?	5/63	2/40	2/40	1/10	2/25	1/13	
14. Did the state director provide sufficient leadership in order to aid in adequate preparation for compliance determination?	6/75	4/67	2/33	-	2/25	-	
15. Did the co-chairperson give MERC team members adequate time to make a thorough review of the areas for which they were responsible?	7/88	7/100	-	-	-	1/13	

Table 3 continued.

Item	Yes # %	Rating of "yes" R				No # %	N/R # %
		Good # %	Fair # %	Poor # %			
16. Were the secretarial services adequate for the review activities?	7/88	3/43	4/57	-		-	1/13
17. Were there adequate materials on hand for you to carry out your job as a MERC team member?	7/83	4/57	3/43	-		1/13	-
18. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	8/100	6/75	2/25	-		-	-
19. Did you agree with the findings and recommendations of the MERC draft report?	6/75	5/83	1/17	-		1/13	1/13
20. Was there sufficient time to prepare the exit report on-site?	7/88	5/71	2/29	-		1/13	-
21. Was there sufficient time to prepare the final report?	4/50	2/50	1/25	1/25		1/13	3/38
22. Was technical assistance available from Regional USOE to assist states in reaching compliance?	8/100	3/38	2/25	1/13		-	-
23. Were the on-site MERC logistical arrangements suitable?	8/100	7/88	1/13	-		-	-

Table 4

Responses of Populations of All States (n=46)

Item	Yes # %	Rating of "yes" R*						NO # %	N/R # %		
		Good		Fair		Poor					
		#	%	#	%	#	%				
1. Did you understand the purposes of MERC?	45/98			38/84			6/13			1/2	
2. Did you understand the basis for determining compliance?	44/96			28/64			13/30			2/4	
3. Did you understand that the purpose of MERC was for determining compliance and not quality?	41/89			36/83			5/12			5/11	
4. In your opinion, were the MERC review teams competent to adequately determine compliance?	45/98			38/84			7/16			-	1/2
5. Were MERC team members courteous and professional in their approach to the task?	46/100			45/98			1/2			-	-
6. Was the size of the MERC review team adequate for the job to be accomplished?	42/91			36/86			6/14			3/7	1/2
7. Was the review team representative of regional, state, and national personnel?	38/83			29/76			3/21			6/13	2/4
8. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	42/91			31/74			10/24			2/4	2/4
9. Was the review team forthright in disclosures of problems where compliance was doubtful?	42/91			35/83			6/14			1/2	3/7
10. Did the review team allow enough time to determine compliance?	43/93			32/74			11/26			2/4	1/2

\*Some respondents did not rate all yes responses.

Table 4 continued

Item	Yes # %	Rating of "yes" R					
		Good		Fair		Poor	
		# %	# %	# %	# %	# %	# %
11. Did the review team divide its efforts to cover the evaluation in your area?	33/83	32/34	6/16	-			
12. Were you given sufficient notice in advance of the review?	46/100	40/37	5/11	1/2			
13. Did you have a pre-review meeting with the MERC team?	29/63	24/83	5/17	-			
14. In the pre-review meeting, were you given enough information to prepare you for MERC?	29/63	10/34	15/52	4/14			
15. In the pre-review meeting, did you learn exactly why the MERC activity was being undertaken?	28/61	22/79	6/21	-			
16. Were you given a list of the compliance items for review prior to a MERC visit?	42/91	35/83	6/14	-			
17. Was the USOE video-tape shown on the first day of the MERC review helpful?	33/72	17/52	13/39	2/6			
18. Were you given sufficient time during the MERC visit to discuss your area of responsibility concerning compliance?	39/85	31/77	8/21	-			
19. Were you provided with examples or specific definitions of compliance?	37/80	25/63	11/30	1/3			
20. Were the questions asked by the MERC team appropriate for determining compliance with the regulations concerning your work area?	41/89	32/78	9/22	-			

No # %	N/R # %
7/15	1/2
-	-
15/33	2/4
13/28	4/9
15/33	3/7
4/9	-
3/20	4/9
6/17	1/2
7/15	2/4
4/9	1/2





	Pos	Rating of pos		
		Good	OK	Poor
1. The report on the	40/57	10/73	13/35	1/3
2. The report on the				
3. The report on the				
4. The report on the	39/55	10/73	1/11	1/3
5. The report on the				
6. The report on the	11/41	11/74	9/11	-
7. The report on the	4/9	1/25	2/36	-
8. The report on the				
9. The report on the	1/4	1/30	1/11	-
10. The report on the				
11. The report on the		6/36	-	-
12. The report on the				
13. The report on the	19/51	36/52	12/31	-
14. The report on the				
15. The report on the	60/77	60/72	3/20	-
16. The report on the				
17. The report on the	1/76	9/35	5/15	-

Pos	R/R
5/11	1/2
5/13	1/2
2/4	2/4
41/39	1/2
43/93	1/2
31/57	3/11
3/7	4/9
3/7	3/7
7/15	5/11

Table 4 continu

Item	Yes # %	Rating of "yes" R						No # %	N/R # %
		Good		Fair		Poor			
		#	%	#	%	#	%		
30. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	28/61	16/37	11/39	1/4			12/26	6/13	
31. Is technical assistance available from Regional USOE to assist states in reaching compliance?	32/70	21/66	10/31	1/3			11/24	3/7	

Table 5

Responses of Colorado Population (N=8)

Item	Yes		Rating of "yes" R <sup>a</sup>						No		N/R	
	#	%	Good		Fair		Poor		#	%	#	%
			#	%	#	%	#	%				
1. Did you understand the purposes of MERC?	8	100	7	88	1	13	-	-	-	-	-	-
2. Did you understand the basis for determining compliance?	3	100	4	50	4	50	-	-	-	-	-	-
3. Did you understand that the purpose of MERC was for determining compliance and not quality?	8	100	5	63	3	38	-	-	-	-	-	-
4. In your opinion, were the MERC review teams competent to adequately determine compliance?	7	88	4	57	3	43	-	-	-	-	1	13
5. Were MERC team members courteous and professional in their approach to the task?	8	100	3	100	-	-	-	-	-	-	-	-
6. Was the size of the MERC review team adequate for the job to be accomplished?	8	100	5	63	3	38	-	-	-	-	-	-
7. Was the review team representative of regional, state, and national personnel?	7	88	6	86	1	14	-	-	1	13	-	-
8. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	7	88	3	43	4	57	-	-	-	-	1	13
9. Was the review team forthright in disclosures of problems where compliance was doubtful?	7	88	6	86	-	-	1	14	-	-	1	13
10. Did the review team allow enough time to determine compliance?	7	88	4	57	3	43	-	-	-	-	1	13

<sup>a</sup>Some respondents did not rate all yes responses.

Table . continued

Item	Rating of "yes" R						No		N/R	
	Yes		Good		Fair		Poor		#	%
	#	%	#	%	#	%	#	%		
11. Did the review team divide its efforts to cover the evaluation in your area?	7/83		5/71		2/29		-		1/13	
12. Were you given sufficient notice in advance of the review?	8/100		6/75		2/25		-		-	
13. Did you have a pre-review meeting with the MERC team?	1/13		-		1/100		-		5/63	2/25
14. In the pre-review meeting, were you given enough information to prepare you for MERC?	1/13		-		1/100		-		4/50	3/38
15. In the pre-review meeting, did you learn exactly why the MERC activity was being undertaken?	1/13		1/100		-		-		5/63	2/25
16. Were you given a list of the compliance items for review prior to a MERC visit?	8/100		6/75		1/13		-		-	
17. Was the USOE video-tape shown on the first day of the MERC review helpful?	4/50		-		4/100		-		2/25	2/25
18. Were you given sufficient time during the MERC visit to discuss your area of responsibility concerning compliance?	7/88		5/36		1/14		-		-	1/13
19. Were you provided with examples of specific determinations of compliance?	5/63		1/20		4/80		-		2/25	1/13
20. Were the questions asked by the MERC team appropriate for determining compliance with the regulations concerning your work area?	7/88		4/57		3/43		-		-	1/13

Table 5- continued

Item	Yes		Rating of "yes" R						No		N/R	
			Good		Fair		Poor					
	#	%	#	%	#	%	#	%	#	%	#	%
21. Did the questions used by MERC really get at the intent of the legislation?	7	88	5	71	2	29	-	-	-	-	1	13
22. Are MERC procedures flexible enough to recognize variations in the governance of vocational education across your state?	7	88	6	36	1	14	-	-	-	-	1	13
23. Was the MERC agenda for the week appropriate for the tasks?	7	88	7	100	-	-	-	-	-	-	1	13
24. Has the final report been received from USOL?	4	50	1	25	2	50	-	-	4	50	-	-
25. Did you receive the final report in adequate time to correct compliance deficiencies?	2	25	1	50	1	50	-	-	5	63	1	13
26. Are the exit report and final report essentially the same?	4	50	4	100	-	-	-	-	3	38	1	13
27. Were follow-up statements in the exit report concerning your need to provide information on compliance clear and attainable?	7	88	5	71	2	29	-	-	-	-	1	13
28. Did you agree with the findings and recommendations of the MERC exit report?	7	88	6	36	1	14	-	-	-	-	1	13
29. Were you given a review of the exit report before the MERC team departed?	7	88	6	36	1	14	-	-	-	-	1	13

Table 5 continued

Item	Yes # %	Rating of "yes" R						No # %	N/R # %
		Good		Fair		Poor			
		#	%	#	%	#	%		
30. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	7/88	4/57	2/29	1/14				-	1/13
31. Is technical assistance available from Regional USOE to assist states in reaching compliance?	7/88	3/43	3/43	1/14				-	1/13

Table 6

Responses of Iowa Population (1-6)

Item	Yes # %	Rating of "yes" R*			
		Good		Fair	
		# %	# %	# %	# %
1. Did you understand the purposes of MERC?	6/100	5/83	1/17	-	-
2. Did you understand the basis for determining compliance?	6/100	6/100	-	-	-
3. Did you understand that the purpose of MERC was for determining compliance and not quality?	6/100	6/100	-	-	-
4. In your opinion, were the MERC review teams competent to adequately determine compliance?	6/100	6/100	-	-	-
5. Were MERC team members courteous and professional in their approach to the task?	6/100	6/100	-	-	-
6. Was the size of the MERC review team adequate for the job to be accomplished?	5/83	5/100	-	-	-
7. Was the review team representative of regional, state, and national personnel?	6/100	6/100	-	-	-
8. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	6/100	5/83	1/17	-	-
9. Was the review team forthright in disclosures of problems where compliance was doubtful?	6/100	6/100	-	-	-
10. Did the review team allow enough time to determine compliance?	6/100	3/50	3/50	-	-

\*Some respondents did not rate all yes responses.

Item	No # %
1.	
2.	
3.	
4.	
5.	
6.	1/17
7.	
8.	
9.	
10.	





Table 6 continued

Item	Yes	Rating of "yes" R				
		Good		Fair		Poor
		#	%	#	%	
11. Did the review team divide its efforts to cover the evaluation in your area?	6/100	5/83	1/17			
12. Were you given sufficient notice in advance of the review?	6/100	6/100				
13. Did you have a pre-review meeting with the MERC team?	5/83	5/100				
14. In the pre-review meeting, were you given enough information to prepare you for MERC?	5/83	2/40	3/60			
15. In the pre-review meeting, did you learn exactly why the MERC activity was being undertaken?	4/67	4/100				
16. Were you given a list of the compliance items for review prior to a MERC visit?	6/100	5/83	1/17			
17. Was the USOE video-tape shown on the first day of the MERC review helpful?	5/83	2/40	2/40	1/20		
18. Were you given sufficient time during the MERC visit to discuss your area of responsibility concerning compliance?	6/100	6/100				
19. Were you provided with examples or specific definitions of compliance?	6/100	6/100				
20. Were the questions asked by the MERC team appropriate for determining compliance with the regulations concerning your work area?	6/100	5/83	1/17			

No	N/R
#	%
3/17	
1/17	
2/33	
1/17	

Table 6 continued

Item	Rating of "yes" R								No	N/R
	Yes	Good	Fair	Poor						
#	%	#	%	#	%	#	%	#	%	
21. Did the questions used by MERC really get at the intent of the legislation?	6/100	5/33	1/17							
22. Are MERC procedures flexible enough to recognize variations in the governance of vocational education across your state?	5/33	5/100						1/17		
23. Was the MERC agenda for the week appropriate for the tasks?	5/33	4/30	1/20					1/17		
24. Has the final report been received from USOE?								6/100		
25. Did you receive the final report in adequate time to correct compliance deficiencies?								6/100		
26. Are the exit report and final report essentially the same?								6/100		
27. Were follow-up statements in the exit report concerning your need to provide information on compliance clear and attainable?	5/33	3/60	2/40						1/17	
28. Did you agree with the findings and recommendations of the MERC exit report?	6/100	3/50	3/50							
29. Were you given a review of the exit report before the MERC team departed?	6/100	6/100								

Table 6 continued

Item	Yes # %	Rating of "yes" R				No # %	N/R # %
		Good # %	Fair # %	Poor # %			
30. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	3/50	2/67	1/33			3/50	
31. Is technical assistance available from Regional USOE to assist states in reaching compliance?	5/23	4/30	1/20			1/17	

Table 7

## Responses of Maine Population (N=12)

Item	Yes # %	Rating of "yes" R*						NO # %	N/R # %
		Good		Fair		Poor			
		# %	# %	# %	# %	# %	# %		
1. Did you understand the purposes of MERC?	11/92	9/82	2/18	-	-	-	1/8	-	
2. Did you understand the basis for determining compliance?	11/92	4/38	6/55	1/9	-	-	1/8	-	
3. Did you understand that the purpose of MERC was for determining compliance and not quality?	10/83	9/90	1/10	-	-	-	2/17	-	
4. In your opinion, were the MERC review teams competent to adequately determine compliance?	12/100	11/92	1/8	-	-	-	-	-	
5. Were MERC team members courteous and professional in their approach to the task?	12/100	12/100	-	-	-	-	-	-	
6. Was the size of the MERC review team adequate for the job to be accomplished?	12/100	12/100	-	-	-	-	-	-	
7. Was the review team representative of regional, state, and national personnel?	11/92	7/64	3/27	1/9	-	-	1/8	-	
8. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	11/92	7/64	4/36	-	-	-	1/8	-	
9. Was the review team forthright in disclosures of problems where compliance was doubtful?	11/92	9/82	2/18	-	-	-	1/8	-	
10. Did the review team allow enough time to determine compliance?	12/100	10/83	2/17	-	-	-	-	-	

\*Some respondents did not rate all yes responses.

Table 7 continued

Item	Yes # %	Rating of "yes" R		
		Good # %	Fair # %	Poor # %
11. Did the review team divide its efforts to cover the evaluation in your area?	8/67	7/88	1/12	-
12. Were you given sufficient notice in advance of the review?	12/100	11/92	1/8	-
13. Did you have a pre-review meeting with the MERC team?	10/83	8/80	2/20	-
14. In the pre-review meeting, were you given enough information to prepare you for MERC?	10/83	6/60	4/40	-
15. In the pre-review meeting, did you learn exactly why the MERC activity was being undertaken?	10/83	5/50	5/50	-
16. Were you given a list of the compliance items for review prior to a MERC visit?	11/92	8/73	3/27	-
17. Was the USOC video-tape shown on the first day of the MERC review helpful?	11/92	5/45	5/45	1/9
18. Were you given sufficient time during the MERC visit to discuss your area of responsibility concerning compliance?	11/92	9/82	2/18	-
19. Were you provided with examples or specific definitions of compliance?	10/83	6/60	4/40	-
20. Were the questions asked by the MERC team appropriate for determining compliance with the regulations concerning your work area?	11/92	7/64	4/36	-

No # %	N/R
4/33	-
-	-
2/17	-
2/17	-
2/17	-
1/8	-
1/8	-
1/8	-
2/17	-
1/8	-



Table 7 continued

Item	Yes # %	Rating of "yes" R					
		Good		Fair		Poor	
		#	%	#	%	#	%
21. Did the questions used by MEPC really get at the intent of the legislation?	10/83	5	50	4	40	1	10
22. Are MERC procedures flexible enough to recognize variations in the governance of vocational education across your state?	10/83	5	50	4	40	1	10
23. Was the MERC agenda for the week appropriate for the task?	11/92	7	64	4	36	-	-
24. Has the final report been received from USOE?	-	-	-	-	-	-	-
25. Did you receive the final report in adequate time to correct compliance deficiencies?	-	-	-	-	-	-	-
26. Are the exit report and final report essentially the same?	-	-	-	-	-	-	-
27. Were follow-up statements in the exit report concerning your need to provide information on compliance clear and attainable?	11/92	7	64	3	27	-	-
28. Did you agree with the findings and recommendations of the MERC exit report?	10/83	7	70	2	20	-	-
29. Were you given a review of the exit report before the MERC team departed?	9/75	6	67	3	33	-	-

No # %	R
2/17	-
2/17	-
1/8	-
12/100	-
12/100	-
11/92	1/8
1/8	-
2/17	-
2/17	-





ed.

	Yes # %	Rating of "yes" R				No # %	N/R
		Good # %	Fair # %	Poor # %			
re provisions ting non- flexible enough for unique situ- ws, organization, es?	8/67	5/63	3/37		3/25	1/8	
at assistance avail- Regional USOE to res in reaching, ?	10/83	9/90	1/10		2/17		

Table 8

Responses of New Jersey Population (N=8)

Item	Yes # %	Rating of "yes" R*					
		Good		Fair		Poor	
		#	%	#	%	#	%
1. Did you understand the purposes of MERC?	8/100	7	88	1	13	-	-
2. Did you understand the basis for determining compliance?	8/100	6	75	1	25	-	-
3. Did you understand that the purpose of MERC was for determining compliance and not quality?	7/88	7	100	-	-	-	-
4. In your opinion, were the MERC review teams competent to adequately determine compliance?	8/100	7	88	1	13	-	-
5. Were MERC team members courteous and professional in their approach to the task?	8/100	8	100	-	-	-	-
6. Was the size of the MERC review team adequate for the job to be accomplished?	8/100	6	75	2	25	-	-
7. Was the review team representative of regional, state, and national personnel?	4/50	3	75	1	25	-	-
8. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	7/88	6	86	-	-	-	-
9. Was the review team forthright in disclosures of problems where compliance was doubtful?	8/100	8	100	-	-	-	-
10. Did the review team allow enough time to determine compliance?	7/88	6	86	1	14	-	-

NO # %	N/R # %
-	-
-	-
1/13	-
-	-
-	-
4/50	-
1/13	-
-	-
1/13	-

Some respondents did not rate all yes responses.

Table 8 continued

Item	Yes # %	Rating of "yes" R						No # %	NA # %
		Good # %		Fair # %		Poor # %			
11. Did the review team divide its efforts to cover the evaluation in your area?	6/75	4/67	2/33					2/24	
12. Were you given sufficient notice in advance of the review?	8/100	6/75	2/25					-	
13. Did you have a pre-review meeting with the MERC team?	3/38	2/67	1/33					5/63	
14. In the pre-review meeting, were you given enough information to prepare you for MERC?	3/38	2/67	1/33					5/63	
15. In the pre-review meeting, did you learn exactly why the MERC activity was being undertaken?	3/38	3/100						1/63	
16. Were you given a list of the compliance items for review prior to a MERC visit?	5/63	4/80	1/20					3/38	
17. Was the USOE video-tape shown on the first day of the MERC review helpful?	4/50	2/50	1/25					4/50	
18. Were you given sufficient time during the MERC visit to discuss your area of responsibility concerning compliance?	4/50	3/75	1/25					4/50	
19. Were you provided with examples or specific definitions of compliance?	7/88	5/71	2/29					1/13	
20. Were the questions asked by the MERC team appropriate for determining compliance with the regulations concerning your work area?	6/75	5/83	1/17					2/25	

Table 8 continued

Item	Rating of "yes" R								No		N/R	
	Yes		Good		Fair		Poor					
	#	%	#	%	#	%	#	%				
21. Did the questions used by MERC really get at the intent of the legislation?	6	75	3	50	3	50	-	-	2	25	-	-
22. Are MERC procedures flexible enough to recognize variations in the governance of vocational education across your state?	6	75	5	83	1	17	-	-	2	25	-	-
23. Was the MERC agenda for the week appropriate for the tasks?	8	100	6	75	2	25	-	-	-	-	-	-
24. Has the final report been received from USOE?	-	-	-	-	-	-	-	-	8	100	-	-
25. Did you receive the final report in adequate time to correct compliance deficiencies?	-	-	-	-	-	-	-	-	8	100	-	-
26. Are the exit report and final report essentially the same?	-	-	-	-	-	-	-	-	7	88	1	13
27. Were follow-up statements in the exit report concerning your need to provide information on compliance clear and attainable?	8	100	4	50	4	50	-	-	-	-	-	-
28. Did you agree with the findings and recommendations of the MERC exit report?	8	100	6	75	2	25	-	-	-	-	-	-
29. Were you given a review of the exit report before the MERC team departed?	6	75	5	83	1	17	-	-	1	13	1	13

Table 8 continued

Item	Yes # %	Rating of "yes" R						No # %		N/R # %	
		Good		Fair		Poor					
		#	%	#	%	#	%				
30. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	5/63			2/40		3/60				3/38	
31. Is technical assistance available from Regional USOE to assist states in reaching compliance?	6/75			3/50		3/50				2/25	



Table 9

## Responses of Puerto Rico Population (N=12)

Item	Yes # %	Rating of "yes" R*						No # %	N/R # %
		Good		Fair		Poor			
		# %	# %	# %	# %	# %	# %		
1. Did you understand the purposes of MERC?	12/100	10/83	1/8	-	-	-	-	-	
2. Did you understand the basis for determining compliance?	11/92	8/73	2/18	-	-	-	1/8	-	
3. Did you understand that the purpose of MERC was for determining compliance and not quality?	10/83	9/90	1/10	-	-	-	2/17	-	
4. In your opinion, were the MERC review teams competent to adequately determine compliance?	12/100	10/83	2/17	-	-	-	-	-	
5. Were MERC team members courteous and professional in their approach to the task?	12/100	11/92	1/8	-	-	-	-	-	
6. Was the size of the MERC review team adequate for the job to be accomplished?	9/75	8/89	1/11	-	-	-	2/17	1/8	
7. Was the review team representative of regional, state, and national personnel?	10/83	7/70	3/30	-	-	-	-	2/17	
8. Did MERC team members you dealt with know what they were to do to carry out their role efficiently?	11/92	10/91	1/9	-	-	-	-	1/8	
9. Was the review team forthright in disclosures of problems where compliance was doubtful?	10/83	6/60	4/40	-	-	-	-	2/17	
10. Did the review team allow enough time to determine compliance?	11/92	9/82	2/18	-	-	-	1/8	-	

\*Some respondents did not rate all yes responses.

Table 9 continued

Item	Yes # %	Rating of "yes" R			No # %	N/R # %
		Good # %	Fair # %	Poor # %		
11. Did the review team divide its efforts to cover the evaluation in your area?	11/92	11/100	=		1/8	
12. Were you given sufficient notice in advance of the review?	12/100	11/92	-	1/8		
13. Did you have a pre-review meeting with the MERC team?	10/83	9/90	1/10	-	2/17	
14. In the pre-review meeting, were you given enough information to prepare you for MERC?	10/83	-	6/60	4/40	1/8	1/8
15. In the pre-review meeting, did you learn exactly why the MERC activity was being undertaken?	10/83	9/90	1/10	-	1/8	1/8
16. Were you given a list of the compliance items for review prior to a MERC visit?	12/100	12/100	-	-		
17. Was the USOE video-tape shown on the first day of the MERC review helpful?	9/75	8/89	1/11	-	1/8	2/17
18. Were you given sufficient time during the MERC visit to discuss your area of responsibility concerning compliance?	11/92	7/64	4/36		1/8	
19. Were you provided with examples or specific definitions of compliance?	9/75	7/78	1/11	1/11	2/17	1/8
20. Were the questions asked by the MERC team appropriate for determining compliance with the regulations concerning your work area?	11/92	11/100	-		1/8	





	Yes # %	Rating of "yes" R		
		Good # %	Fair # %	Poor # %
the questions used by really get at the t of the legislation?	11/92	11/100		
ERC procedures flexi- ough to recognize tions in the governance ational education s your state?	11/92	10/91	1/9	
the MERC agenda for the appropriate for the ?	11/92	9/82	2/17	
the final report been ved from USCIS?				
to receive the final t in adequate time rrect compliance encies?				
the exit report and report essentially ame?	3/25	2/67		
follow-up statements in xit report concerning need to provide infor- n on compliance clear tainable?	8/67	5/63	1/13	
you agree with the ngs and recommendations e MERC exit report?	9/75	8/89		
you given a review of xit report before the team departed?	6/50	6/100		

No # %	N/R # %
1/8	
1/8	
	1/8
11/92	1/8
12/100	
4/33	5/42
2/17	2/17
1/8	2/17
4/33	2/17

Table 9 continued

Item	Yes # %	Rating of "yes" R				No # %	N/R # %
		Good # %	Fair # %	Poor # %			
30. Are the time provisions for correcting non-compliance flexible enough to provide for unique situations, laws, organization, and policies?	5/42	3/60	2/40			3/25	4/33
31. Is technical assistance available from Regional USOE to assist states in reaching compliance?	4/33	2/50	2/50			6/50	2/17

## ABSTRACT

During the fall of 1976 the Bureau of Occupational and Adult Education, U. S. Office of Education, contracted with Sierra Planning and Research Associates to conduct an evaluation of the MERC process. The objectives of this assessment were: (1) to determine the feasibility of continuing the program, (2) to determine ways to improve the process, (3) identify cost to states for the review, (4) identify benefits to the states, and (5) identify benefits to USOE.

Utilizing a structured interview approach, SPRA contacted personnel in five of the 13 states which had been reviewed by MERC. SPRA also interviewed personnel in six Regional Offices and various personnel from the Central USOE. Additionally, SPRA observed the MERC review in Idaho.

A total of 87 persons were interviewed by SPRA, and data from these various sources yielded 14 recommendations which are categorized as follows:

1. The MERC process should be better organized.
2. Communications should be improved among all personnel.
3. The MERC process should be reviewed periodically to remove or alter unsuitable items.
4. The process should be systematized through the development and usage of a procedures manual.

The general conclusion of the investigators is that the MERC process should be continued on a regular basis as practically all the people interviewed held the concept of MERC in esteem.



